



Joint Statement of the Coalition of HUD Intermediaries and the National Housing Resource Center

The housing counseling sector, represented by the Coalition of HUD Intermediaries and the National Housing Resource Center, recognizes the importance of collaborative efforts to foster a more robust integration into the housing finance system.

In an era in which levels of homeownership, especially among minority and underserved populations, are at historic lows, we recognize that housing counseling can transform the housing landscape by providing housing access and sustainability for tens of millions of American families.

Housing Counselors Aligning with MISMO Standards

As Members of the housing counseling sector, we recognize the important role that data and technology play in helping us best serve and understand our counseling clients. We have agreed to align the housing counseling data standard with MISMO in order to better facilitate this engagement across the counseling, housing and servicing sectors. We will therefore seek CMS's that use the MISMO standard. We believe that aligning counseling systems with MISMO will also help facilitate increased engagement with lender partners as we explore opportunities to implement fee for service programs. By adopting this standard, we will also pursue MISMO membership with the goal of creating a housing counseling working group to help ensure the views of the housing counseling sector are reflected in the MISMO standard.

Housing Counselors see the benefits of data standardization as the ability to:

- Efficiently interface with servicers and lenders to ensure that clients receive the best products and services;
- Allow counselors to track and report on client outcomes when a client is connected directly to a lender through a CMS and receives products or support through this connection;
- Enable information sharing to understand client outcomes—moving beyond whether a client bought a home or received a loan modification to what the terms of the loans are and the client's post-purchase success or struggles;
- Understand the value of counseling across the board, and in particular in order to structure fee-for-service arrangements;
- Have a view of the life of a loan, being able to look back with speed and efficiency at the history of a borrower when post-purchase, credit, or foreclosure mitigation services are needed;
- Facilitate billing of fee-for-service activity;
- Reduce or ease reporting to lenders, servicers, funders, and government agencies.

Adopting Common Frameworks for Fee-For-Service Arrangements with Lenders

The No Action Letter released by the Consumer Financial Protection Bureau and Department of Housing and Urban Development governing lender-paid fee-for-service arrangements with housing counselors for pre-purchase counseling presents a tremendous opportunity to deploy housing counselors to reduce America's homeownership gap. This announcement followed years of advocacy and work from the counseling community, often supported by leaders in lending and policymaking.

In order to implement and scale these pre-purchase housing counseling agreements, the housing counseling sector recognizes the need to:

- Develop a Common Framework for representing the cost of conducting comprehensive and effective pre-purchase housing counseling programs, consistent with the standards put forth by the CFPB and HUD;
- Adopt centralized agreements between mortgage lenders and Counseling Intermediaries allowing the lenders to contract with multiple counseling agencies simultaneously;
- Implement technology to facilitate referrals of counseled clients to mortgage lenders according to common standards.